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*Attorneys for Defendants Johnny R. Thomas and  
John C. Francis*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

vs.

JOHNNY R. THOMAS,  
ROBERT C. POTTS,  
JONATHAN BRETT WOODARD, and  
JOHN C. FRANCIS,

Defendants.

Case No. 2:19-cv-1132-JCM-EJY

**STIPULATION AND  
~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME  
FOR DEFENDANTS TO  
FILE RESPONSE TO  
PLAINTIFF'S  
OBJECTIONS TO  
MAGISTRATE'S ORDER**

**[First Request]**

1 Pursuant to Local Rule IA 6-1, Plaintiff Securities and Exchange Commission (“SEC”) and  
2 Defendants Johnny R. Thomas (“Thomas”) and John C. Francis (“Francis”) (collectively, “Defendants”)  
3 stipulate and agree as follows:

4 1. On November 20, 2020, the Court granted in part and denied in part Defendants’ Motion  
5 to Compel Production of Documents. (Dkt No. 59.) Plaintiff was ordered to submit to the Court for in-  
6 camera review the interview notes that were discussed in open court during the November 20, 2020  
7 hearing on Defendants’ Motion to Compel.

8 2. On December 7, 2020, the Court issued an order directing Plaintiff to, among other  
9 things, review the Court’s proposed redactions to the interview notes. (Dkt. No. 64.) The order further  
10 provided that the SEC may file a motion seeking changes to the Court’s proposed redactions and that  
11 such motion shall be filed no later than thirty (30) court days following the date of the Court’s order.

12 3. On December 21, 2020, Plaintiff filed Objections to Magistrate’s Order Compelling  
13 Disclosure of “Facts” in Attorney Interview Notes (“Objections”). (Dkt. No 65.) Pursuant to local rules,  
14 Defendants’ response to Plaintiff’s Objections are due by January 4, 2021.

15 4. Counsel for Defendants will be unavailable for several days due to the upcoming holidays  
16 and requested an extension from counsel for Plaintiff to file Defendants’ response to Plaintiff’s  
17 Objections.

18 5. The parties hereby stipulate and agree that an extension of the time for Defendants to file  
19 a response is appropriate in light of the upcoming holidays and that Defendants’ deadline to file a  
20 response to Plaintiff’s Objections be extended from January 4, 2021 to January 13, 2021. The parties  
21 further stipulate and agree that Plaintiff’s deadline to file a reply brief in support of its Objections will be  
22 January 20, 2021.

23 6. The parties further hereby stipulate and agree that all deadlines established by the Court’s  
24 December 7, 2020 order (Dkt. No. 64) shall be held in abeyance pending a ruling by this Court on  
25 Plaintiff’s Objections. Further, if appropriate based on a ruling by this Court on Plaintiff’s Objections,  
26 the Court will establish new deadlines for any remaining tasks that must be completed with respect to  
27 the interview notes (i.e., redactions, privilege logs, and motions relating to same).

1 **IT IS SO STIPULATED:**

2 Dated: December 23, 2020

Respectfully submitted,

3  
4 /s/ Randall R. Lee

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8  
9 -and-

10 Adam C. Trigg  
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13 *Attorneys for Defendants Thomas and Francis*

15 Dated: December 23, 2020

16 /s/ Suzanne J. Romajas

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20 *Attorney for Plaintiff*

22 **IT IS SO ORDERED:**

23 Date: December 28, 2020

24   
25 UNITED STATES MAGISTRATE JUDGE